

HOWARD J. SCHWARTZ

One Boland Drive
West Orange, NJ 07052
973.530.2031
Fax: 973.530.2231
hschwartz@csglaw.com

csglaw.com

April 20, 2016

Via E-filing and Email: chambersnysdseibel@nysd.uscourts.gov
The Honorable Cathy Seibel
United States District Court
for the Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building
and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: The Wave Studio, LLC v. General Hotel Management Ltd., et al. Case No. 7:13-cv-09239-CS-PED

Dear Judge Seibel:

This firm is counsel for Defendant General Hotel Management Ltd. ("GHM"). In accordance with the Court's order of December 3, 2015 (sent via ECF on December 9, 2015), GHM's reply brief in support of its Motion for Summary Judgment and in opposition to Plaintiff's Cross Motion for Summary Judgment was to be served on counsel for the Plaintiff, The Wave Studio, LLC ("Plaintiff") on Thursday, April 14, 2016.

Unfortunately, our office experienced a firm-wide system crash during the afternoon of April 14, 2016, rendering it impossible for us to access previously saved documents, edit and save documents, and send and receive emails for some time. Accordingly, this office contacted counsel for Plaintiff, Vijay Toke, via telephone and obtained his consent to a one-day extension to the April 14, 2016 deadline. In return, GHM consented to granting Plaintiff a one-day extension of its deadline to submit its reply brief, originally set for Thursday, April 28, 2016.

As such, we respectfully request that the Court extend the return date for the summary judgment motions to Friday, April 29, 2016. In accordance with the Court's request that this motion be bundled, GHM and Plaintiff's papers will'all be filed on that date.

Please feel free to contact me should you require any additional information.

Respectfully submitted.

Howard J. Schwartz

HJS:ajr

cc: All parties via ECF